

# EXHIBIT 11

**TO PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION *IN LIMINE*  
NUMBER 2, SEEKING EXCLUSION OF EXPERT TESTIMONY**

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**Tobias: Plaintiff Expert Disclosures**

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**David B. Owens** <david@loevy.com>

Mon, Jun 11, 2018 at 8:37 PM

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Counsel:

Please see the attached.

As you'll recall, during discovery we went back and forth about psych experts and even agreed to Plaintiff being subject to an IME under Rule 35. As we all know, discovery is much broader than trial. To that end, we have not disclosed a psych expert and do not intend to call one to testify at trial, and believe that Defendants' examiner should be out as well. Happy to discuss this if you'd like.

Let me know if you have any trouble opening the attachments, too.

Last, does any one require these to be mailed as well?

Thanks,

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David B. Owens

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**5 attachments****Art Tobias v City of Los Angeles Rule 26 Report 1a.pdf**  
1677K**DrLeoReportJune102018.pdf**  
253K**DrRichardLeoCVJune2018.pdf**  
275K**Tobias\_Plaintiff Expert Disclosures.pdf**  
101K**McKay Enlarged Photos.zip**  
21003K